UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 17, 2000

Paul Whatling
Jellinek, Schwartz & Connolly, Inc.
1525 Wilson Boulevard, Suite 600
Arlington, VA 22209

Dear Mr. Whatling:

As the authorized agent for Cheminova Agro A/G, we are sending you the Office of Pesticide Programs' (OPP) human health risk assessment for malathion. We are providing you with a 30-day period to identify and comment on errors only. Your comments must be received within 30 days of receipt of this letter. The Agency will review and evaluate your comments on errors upon receipt.

During this 30-day comment period, the Agency asks for comments on errors, confidential business information (CBI), and future data submissions only. The Agency will respond only to errors which do not pertain to matters of policy, interpretation, or applicability of data. Errors include, but are not limited to, mathematical, computational, typographic, or other similar errors. In the process of reviewing the Agency's preliminary risk assessment, we ask that you inform us in writing of any claims of CBI contained in this assessment. If we do not receive notification in writing of any such claims within 30 days, the Agency will assume that the document is free of CBI. Also, we request that you inform the Agency of any pertinent, on-going or planned studies, or other sources of information on malathion, and your timetable for completing and submitting such data and information to the Agency.

There is a pharmaceutical use of malathion as a pediculicide for the treatment of head lice and their ova, which is not covered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The Food and Drug Administration approves and enforces uses of pesticide-containing pharmaceutical products under the Federal Food, Drug and Cosmetic Act (FFDCA). Therefore, the potential for exposure from this use has not been included in the aggregate assessment.

If during this 30-day period, you submit comments other than on errors, you should clearly indicate that they are submitted in advance for the 60-day public comment period. You should provide a summary of the comments and refer to an attachment which provides a more in-depth discussion.

Please mail your responses and any claims of CBI and other information about malathion to me, the chemical review manager (CRM) for malathion. If you have any questions, I can be reached at (703) 308-8011.

Sincerely,

Patricia L. Moe
Special Review and
Reregistration Division